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MEMBER: N.Y. & N.J. BAR**

April 17, 2023

The Honorable Gregory H. Woods  
United States District Court Judge  
For the Southern District of New York  
United States District Court  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Santos, et al.*, 22-Cr-522 (GHW)  
Request to Appoint Associate Counsel for Defendant Eddy Caminero

Dear Judge Woods:

I am appointed CJA counsel to Eddy Caminero, a defendant in the above-captioned case. I write today to request the appointment of Clara Kalhous, Esq., as associate counsel to assist in the representation of Mr. Caminero.

Mr. Caminero is charged with narcotics trafficking conspiracy (violation of 21 U.S.C. §§ 846 & 841(b)(1)(A)) and with the carrying and possession of a firearm during and in furtherance of that crime (violation of 18 U.S.C. § 924(c)(1)(A)(i)). He faces a mandatory minimum sentence of 15 years of imprisonment if convicted of these offenses.

As the Court knows from its prior approval of the defendants' request for appointment of a Coordinating Discovery Attorney, the discovery in this case is voluminous. The initial production of discovery includes cell phone extractions, undercover buy reports with audio and video footage and accompanying lab reports, and Instagram search warrant returns. Additional discovery, including extractions from 26 electronic devices is anticipated. It is my understanding that Mr. Caminero is captured on multiple audio recordings. A considerable amount of the discovery is marked sensitive pursuant to the protective order entered in this case. To avoid any unauthorized distribution of this discovery, it is necessary for counsel to review it with Mr. Caminero in person. Although time consuming, this is the only feasible means of discussing the material with him and ascertaining whether there are any motions that should be filed on Mr.

Caminero's behalf. Having now reviewed some of the discovery produced, and discussed the case with Mr. Caminero preliminarily, it appears that Mr. Caminero will proceed to trial.

I respectfully submit that appointment of associate counsel to assist in the representation of Mr. Caminero at this point would represent a cost saving measure to the Court and a time saving measure for counsel. Ms. Kalhous will assist in the review of the discovery with Mr. Caminero, assist in drafting the pretrial motions, and assist in all aspect of trial preparation as well as the trial itself.

Ms. Kalhous is an experienced senior associate attorney who has previously been assigned to assist me in numerous cases in the Southern and Eastern Districts of New York and in the Second Circuit, several of which have proceeded to trial. In addition, she has been appointed to assist other CJA panel attorneys in numerous cases since 2010. In all instances, Ms. Kalhous' work has been efficient and targeted to assist me in client representation through initial discovery review and summaries, motion research and drafting, client visits, and family communications. I respectfully submit that this case, in light of the voluminous discovery and the anticipated motion practice, is one in which Ms. Kalhous' appointment would be both efficient and effective.

If the Court is inclined to grant this request, I respectfully request that Ms. Kalhous be appointed at the associate rate of \$120 per hour, a rate that is less than 75% of the current rate for CJA counsel, and one that would represent a significant cost savings for the Court.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Donna Newman